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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

JANE DOE, on behalf of herself and  
all others similarly situated,

Plaintiff,

v.

PHE, INC. and GOOGLE LLC

Defendants.

Case No.: 2:24-cv-01065-RGK-SK

[Los Angeles County Superior Court  
Case No. 24STCV00181]

**DECLARATION OF BENEDICT Y.  
HUR IN SUPPORT OF GOOGLE LLC'  
MEMORANDUM IN OPPOSITION TO  
PLAINTIFF'S MOTION TO REMAND**

**CLASS ACTION**

Date: April 8, 2024

Time: 9:00 a.m.

Judge: Hon. R. Gary Klausner

Action Filed: January 3, 2024

Removal: February 7, 2024

1 I, Benedict Y. Hur, declare as follows:

2 1. I am a member of the bar of the State of California and a Partner at Willkie  
3 Farr & Gallagher LLP, counsel of record for Defendant Google LLC (“Google”) in this  
4 action. I submit this declaration in support of Google’s Opposition to Plaintiff’s Motion  
5 to Remand. I make this declaration of personal, firsthand knowledge, and if called and  
6 sworn as a witness, I could and would testify as set forth below.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the *Frasco v.*  
8 *Flo Health, Inc.*, 3:21-cv-00757-JD Consolidated Class Action Complaint, filed Jan.  
9 29, 2021. I am counsel of record for Google in this case.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of the *Doe v.*  
11 *GoodRx Holdings, Inc.*, 3:23-cv-00501-AMO Consolidated Class Action Complaint,  
12 filed Feb. 2, 2023. I am counsel of record for Google in this case.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of *Doe v. Google*  
14 *LLC*, 3:23-cv-02431-VC First Amended Consolidated Class Action Complaint, filed  
15 May 17, 2023. I am counsel of record for Google in this case.

16 I declare under penalty of perjury of the laws of the United States and the State  
17 of California that the foregoing is true and correct.

18 Executed on March 18, 2024, at San Francisco, California.

19  
20 /s/ Benedict Y. Hur  
21 BENEDICT Y. HUR  
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